

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ROSE ANDERSON,

Plaintiff,

Case No. 2022-  
Honorable:

vs.

MGM GRAND DETROIT, LLC,  
a foreign limited liability company,

Defendant.

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ALSPECTOR, SOSIN & NOVECK, PLLC

ROBERT M. SOSIN (P35414)

DANIEL NOVECK (P28087)

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**COMPLAINT AND  
DEMAND FOR JURY TRIAL**

Plaintiff ROSE ANDERSON submits the following Complaint against  
Defendant MGM Grand Detroit, LLC:

1. Plaintiff is a resident of the State of Michigan.

2. Defendant is a foreign limited liability company doing business in the Eastern District of Michigan, Southern Division.

3. The amount in controversy exceeds Seventy Five Thousand (\$75,000.00) Dollars.

4. This action arises out of the violation of Plaintiff's civil rights under the Family and Medical Leave Act of Act of 1993, as amended, 29 U.S.C. Section 2601, et seq. (FMLA).

5. This Court has jurisdiction over this action pursuant to 28 U.S.C. Section 1331.

6. Plaintiff was employed by Defendant from April, 2016 through June, 2022.

7. Plaintiff's employment was terminated on June 28, 2022.

8. Plaintiff was employed by Defendant as an assistant shift manager at Defendant's casino.

9. Prior to Plaintiff's hiring, she was diagnosed with hyperthyroidism, migranes, depression and anxiety, which conditions she disclosed to Defendant prior to being hired.

10. Due to these conditions, Plaintiff made use of intermittent FMLA on occasion during her employment.

11. Defendant wrongfully terminated Plaintiff's employment on June 28, 2022 due to her use of intermittent FMLA, in violation of her civil rights, based on pretext.

12. Plaintiff was a capable and competent employee.

13. Defendant discriminated against Plaintiff and violated her civil rights because of her use of intermittent FMLA, in violation of Section 105(a)(2) of FMLA (29 U.S.C. Section 2615 (a)(2)) by wrongfully terminating her.

14. As a result of Defendant's defalcations, Plaintiff suffered damages, economic and non-economic, and will continue to suffer damages in the future.

Accordingly, Plaintiff requests entry of Judgment against Defendant that provides the following relief:

A. An award of money that fully and completely compensates Plaintiff for her injuries and damages proximately caused by the wrongful acts and/or omissions of Defendant;

B. An additional amount equal to all wages, salary, employment benefits and other compensation denied or lost to Plaintiff by reason of Defendant's violations of FMLA, plus statutory interest, pursuant to Section 107(a)(1)(A) of FMLA, 29 USC §2617(a)(1)(A);

C. Reasonable attorney fees, reasonable expert witness fees and other costs of the action, pursuant to Section 107(a)(3) of FMLA, 29 USC §2617(a)(3); and

D. Such other legal and equitable relief as the Court and jury deem fair and just under the circumstances.

Dated: December 13, 2022

/s/ Daniel Noveck  
ROBERT M. SOSIN P35414  
DANIEL NOVECK P28087  
Attorneys for Plaintiff

**JURY DEMAND**

Plaintiff requests trial by jury in this action.

Dated: December 13, 2022

/s/ Daniel Noveck  
ROBERT M. SOSIN P35414  
DANIEL NOVECK P28087  
Attorneys for Plaintiff